



**PATRICK D. CROCKER**  
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February 23, 2010

Ms. Marlene H. Dortch, Commission Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

*Filed Electronically Via ECFS*

RE: Alliance Group Services, Inc.  
Customer Proprietary Network Information Certification  
EB Docket No. 06-36

Dear Ms. Dortch:

Alliance Group Services, Inc., by its undersigned attorneys, hereby submits its 2009 CPNI Compliance Certificate and Accompanying Statement certifying compliance with Section 64.2001 *et seq.* of the Commission's rules.

Please contact the undersigned should you have any questions or concerns at (269) 381-8893 extension 226 or [patrick@crockerlawfirm.com](mailto:patrick@crockerlawfirm.com).

Very truly yours,

CROCKER & CROCKER, P.C.

  
Patrick D. Crocker

PDC/tld

Enclosures

cc: Best Copy and Print, Inc. (via e-mail [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2009

Date filed: February 16, 2010

Name of Company Covered by this Certification: Alliance Group Services, Inc.

Form 499 Filer ID: 820411

Name of Signatory: Jess DiPasquale


Title of Signatory: President

I am the President of Alliance Group Services, Inc. and as such do hereby certify, affirm, depose, and say that I have authority to make this Customer Proprietary Network Information ("CPNI") Annual Certification of Compliance on behalf of Alliance Group Services, Inc. I have personal knowledge that Alliance Group Services, Inc. has established adequate operating procedures to ensure compliance with the Commission's CPNI rules as set forth in 47 C.F.R. § 64.2001 et. seq.

Attached to this Certification is an Accompanying Statement explaining how the company's procedures ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Alliance Group Services, Inc. received no customer complaints in the past year concerning the unauthorized release of CPNI. Further, Alliance Group Services, Inc. has taken no action against data brokers for the unauthorized release of CPNI during calendar year 2009. Alliance Group Services, Inc. will report any information it may obtain with respect to the processes pretexters are using to attempt to access CPNI and what steps Alliance Group Services, Inc. is taking to protect CPNI.

This certification is dated this 16 day of February, 2010.

  
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Jess DiPasquale  
President  
Alliance Group Services, Inc.

## **Customer Proprietary Network Information Certification Attachment A**

Alliance Group Services, Inc. has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, ("Section 222") and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in sections 64.2001 – 64.2011 of the Commission's rules. This attachment summarizes those practices and procedures, which have been updated so that they are adequate to ensure compliance with the Commission's CPNI rules.

Alliance Group Services, Inc. provides private telecommunications services over dedicated lines to large enterprise and carrier customers pursuant to ICB contracts. Alliance Group Services, Inc.'s customer contracts uniformly contain confidentiality agreements that address customers' private information. It is Alliance Group Services, Inc.'s policy not to disclose CPNI except as specifically set out in its contracts with its customers and where required by law.

### **Safeguarding against pretexting**

- Alliance Group Services, Inc. takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. Alliance Group Services, Inc. is committed to notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

### **Training and discipline**

- Alliance Group Services, Inc. has an express disciplinary process in place for violation of the Alliance Group Services, Inc.'s CPNI practices and procedures. Alliance Group Services, Inc. employees are required to review and abide by Alliance Group Services, Inc.'s Code of Conduct, which, prohibits all employees from using customer information other than for providing service to the customer or as required to be disclosed by law.

### **Alliance Group Services, Inc.'s use of CPNI**

- Alliance Group Services, Inc. uses CPNI for the following purposes:
  - (1) To initiate, render, maintain, repair, bill and collect for services;
  - (2) To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
  - (3) For network maintenance; and
  - (4) As required by law.

- Alliance Group Services, Inc. does not distribute CPNI to third parties for their sales or marketing purposes. Nor does Alliance Group Services, Inc. share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors, or any other third party for the purpose of marketing any service.
- Alliance Group Services, Inc. does not share, sell, lease or otherwise provide CPNI to any third party except pursuant to appropriate non-disclosure agreements. Alliance Group Services, Inc. will not otherwise disclose CPNI to a third party except when required by a lawfully issued government subpoena.

#### **Additional safeguards**

- Alliance Group Services, Inc. does not use CPNI for marketing purposes and therefore does not have records to maintain regarding marketing campaigns that use its customers' CPNI.
- Alliance Group Services, Inc. has established a supervisory review process designed to ensure compliance with the FCC's CPNI rules.
- Alliance Group Services, Inc. designates one or more officers, as an agent or agents of the Alliance Group Services, Inc., to sign and file a CPNI compliance certificate on an annual basis. The certificate conforms to the requirements set forth in FCC rule 64.2009(e).
- Alliance Group Services, Inc. does not disclose CPNI over the phone and does not allow for online access to CPNI.
- In the event of a breach of CPNI, Alliance Group Services, Inc. will comply with all applicable breach notification laws.